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STEPHEN F. HEDINGER
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April 5, 2002

Mr. Thomas P. Turner
Assistant Regional Counsel
United State Environmental Protection Agency
Region 5
CS-3T
77 West Jackson Boulevard
Chicago, IL 60604-2402



RE: RRG/Clayton Chemical Company Superfund Site

Dear Mr. Turner:

I represent Komatsu America International Co., which you have identified as a Potentially Responsible Party (PRP) with respect to your anticipated removal action at the above-referenced site. I was in attendance on behalf of Komatsu at the meeting held on Thursday, March 28, at the East St. Louis Public Library, and this letter is the correspondence requested by you at that meeting regarding the position my client is currently taking with respect to this matter.

At this time my client is willing to participate in discussions between and among the PRPs, to determine whether a PRP group can be formed and whether any unified PRP action can be proposed. As you may be aware, a conference call was conducted among the PRPs that had been identified in your previous correspondence on Wednesday, April 3, and another meeting has been scheduled for Wednesday, April 24, at which time further and more detailed discussions are anticipated. I participated in the conference call and expect to participate in the April 24 meeting on behalf of Komatsu.

My client's focus, at least at the present, will be upon obtaining a de minimus settlement from the PRPs and with your agency; if it is not possible to work this out with the PRPs, we may seek this result directly from your office. As you know from your volumetric ranking, Komatsu's participation among the named PRPs amounts to about .06% (and there are a few named PRPs with even lower volumetric rankings). It would appear to be in everyone's best interests to find a means to allow my client, and the other minor parties, to cut their losses, and bring this matter to an early close as to their participation.

Also, in the event for some reason a de minimus resolution is not made available to my client, it would be our expectation that significant research should be conducted at an early time concerning other PRPs responsible for conditions at the site, and particularly with respect to the condition of the soils.

Please contact me directly if you have any questions to ask or further information to convey.

Very truly yours,

Stephen F. Hedinger

SFH/arp